

GUAM ENVIRONMENTAL PROTECTION AGENCY

AHENSIAN PRUTEKSION LINA'LA GUAHAN
POST OFFICE BOX 2999 AGANA, GUAM 96910 TELEPHONE: 646-8863/64/65

JUN 29 1988

Mr. Rick Sugarek
Remedial Project Manager
Office of Superfund Programs
Toxics and Waste Management
Division
U.S. Environmental Protection
Agency, Region
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Sugarek:

We have received your June 22, 1988 letter transmitting the draft Proposed Remedial Action Plan (PRAP) for the Ordot Landfill site for our review and comment.

The following are our comments on the draft PRAP.

- 1. Page 1, Site Background, 1st Paragraph There are three (3) municipal landfills on-island. Ordot Landfill is the only municipal landfill serving the civilian community of Guam.
- 2. Page 1, Site Background 2nd Paragraph Ordot Landfill was established on the slope of a single ravine with the Lonfit River at the bottom of this ravine. The Landfill is adjacent to the Lonfit River which flows into the Pago River and eventually into Pago Bay.
- 3. Page 2, Site Background, 1st Paragraph The word "operations" in the third sentance of this paragraph should be singular and not plural.
- 4. Page 3, Purpose of Proposed Plan, 1st Paragraph Instead of using the Guam EPA mailing address as the repository for the PRAP and Administrative Record, we suggest you use the location address of Guam EPA offices;

Guam EPA Harmon Plaza Building Harmon Industrial Park Harmon, Guam

5. Page 3, Community Role in Selection Process, 2nd Paragraph - Charles P. Crisostomo is the proper spelling for the Guam EPA Administrator's name.

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- 6. Page 3, Community, Role in Selection Process, 3rd Paragraph The correct location for holding the public hearing is Guam EPA, Harmon Plaza Building, Harmon Industrial Park, Harmon, Guam.
- 7. Page 3, Site Location, 1st Paragraph Figure 1-1 was not included in the draft PRAP.
- 8. Page 4, Site Location, 2nd Paragraph Figure 1-2 was not included in the draft PRAP.
- 9. Page 4, Site History, 1st Paragraph The Ordot Landfill is the only municipal landfill on the island of Guam serving the civilian community and is currently operated by the Government of Guam.
- 10. Page 4, Site History, 2nd Paragraph Ordot Landfill is presently used as the only acceptable repository of municipal waste for the civilian population of the island.
- 11. Page 4, Site History, 3rd Paragraph See comment under #2.
- 12. Page 4, site History, 4th Paragraph The word "Landfill" should be inserted after Ordot in the first sentance of this paragraph.
- 13. Page 5, Initial Site Characterization (ISC), 3rd Paragraph The word "perennial" is misspelled in the first sentance of this paragraph.
- 14. Page 6, Initial Site Characterization (ISC), 1st Paragraph The word "a" between of and minor in the first sentance of this paragraph should be removed.
- 15. Page 6, Site Geology, Regional Geology, 2nd Paragraph 'Mount Santa Rosa' is misspelled in the first sentance of this paragraph.
- 16. Page 8, Site Hydrology, Precipitation, 2nd Paragraph The first sentance of this paragraph should be rephrased as follows; "The wet season runs from July through December and marks the beginning of the typhoon season."
- 17. Page 8, Site Hydrology, Precipitation, 1st Paragraph "Rainfall" is misspelled in the third sentance of this paragraph.
- 18. Page 10, Analytical Data, Table 3-3 "Leachate" is misspelled under the description column for sample number SW-10.
- 19. <u>Page 11, Analysis of Data, 2nd Paragraph</u> The word "Samples" in the third sentance of this paragraph should be singular and not plural.
- 20. Page 11, Analysis of Data, 3rd Paragraph "Inorganic" is misspelled in the second sentance of this paragraph.

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Should you have any questions or require further clarification of our comments, please do not hesitate to contact me as soon as possible.

Sincerely yours,

JAMES L. CANTO Head, Air and Land Programs Division

CC: Doris Lee-Betuel, USEPA Region IX

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